

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CKR LAW LLP f/k/a CRONE KLINE RINDE,
LLP,

Petitioner,

v.

ANDERSON INVESTMENTS
INTERNATIONAL, LLC, PARAMOUNT
SERVICES LLC a/k/a PARAMOUNT SERVICES
LTD., INTECH HOLDINGS (HK) LIMITED a/k/a
INTECH INTERNATIONAL GROUP CO.
LIMITED a/k/a INTECH HOLDINGS INC.,
WHITE ROCK ELECTRONIC TRADING LLC,
BMR CONSULTING, EDMUND WHITE a/k/a
RAVI RACH, GULZHAN NAMAZBAEVA, and
SATYABRATO CHAKRAVARTY,

Respondents.

Civil Action No. 1:20-cv-7937-JSR

**DECLARATION OF STUART
McDONALD**

STUART McDONALD declares, pursuant to 28 U.S.C. 1746, as follows:

1. I am over the age of eighteen and competent to make this declaration.
2. I am a partner at Matrix Intelligence. Matrix Intelligence is a corporate intelligence services firm with offices in London and Edinburgh.
3. I have over 4 years of experience in corporate intelligence, including tracing and locating people for service in connection with litigations and arbitrations. Before becoming a partner of Matrix Intelligence, I served as Chief of Staff to the CEO of a global private equity firm and before that, as Chief of Staff to the CFO of Barclays Bank PLC. Prior to that, I spent 17 years as an Army officer.
4. Having first been provided with a statement of legitimate interest to comply with GDPR, I was retained by Felicello Law P.C., on behalf of CKR Law LLP (“CKR”), to locate Gulzhane Namazbaeva for service of process in the above-captioned action.
5. In connection with this investigation, I was provided with a copy of a document entitled “Joint Participation Agreement,” dated December 14, 2019, which bears a signature made

by Ms. Namazbaeva on behalf of Anderson Investments International, LLC (“Anderson”). I am informed that the Joint Participation Agreement was obtained from the files of CKR and was previously submitted to the Court. I was then asked if I could obtain a sample of Ms. Namazbaeva’s signature against which to compare this.

6. I conducted Open Source enquiries in Moscow and was able to obtain a copy of her signature and compare this to the signature on the Joint Participation Agreement. The signatures matched.

7. I then traced Ms. Namazbaeva to a certificate of incorporation of a private limited company on UK Companies House – Steppe Capital (UK) Limited, company number: 8806924. This document listed Ms. Namazbaeva’s date of birth as December 25 1964 and her address at the time as Apartment 23, Novocheremushkinskaya, Ulitsa 23K1, Moscow.

8. Using this information, I was able to obtain Ms. Namazbaeva’s credit file in the U.K.

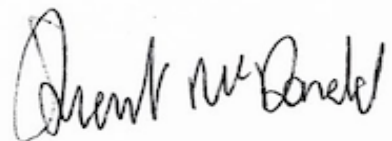
9. Ms. Namazbeava’s U.K. credit file shows that she has resided in London since 2015. Her current residential address is 114B, Heath Road, Twickenham, London, TW1 4BW.

10. According to the credit file I reviewed, Ms. Namazbaeva’s confirmed the accuracy of this address with a financial institution as recently as December 29, 2020. Ms. Namazbaeva also goes by the name “Guljan Namazbaeva.”

11. Accordingly, I am able to conclude with confidence that Ms. Namazbaeva’s current residential address is 114B, Heath Road, Twickenham, London, TW1 4BW.

I declare under penalty of perjury under the laws of the United States of Americas that the foregoing is true and correct.

Executed in Edinburgh, Scotland on: March 22, 2021

A handwritten signature in black ink, appearing to read "Stuart McDonald", written in a cursive style.

Stuart McDonald